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August 16, 2019

VIA CM/ECF & HAND DELIVERY

The Honorable Jennifer L. Hall
U.S. District Court for the District of Delaware
844 N. King Street
Wilmington, DE 19801

Re: CoolTVNetwork.com, Inc. v. Blackboard, Inc., C.A. No. 19-291-LPS-JLH;
CoolTVNetwork.com, Inc. v. Kaltura, Inc., C.A. No. 19-294-LPS-JLH

Dear Magistrate Judge Hall:

We write on behalf of Plaintiff and Defendants in the above-captioned cases to request deferral of the scheduling procedures ordered by the Court on July 24, 2019¹, including the August 23, 2019 deadlines for the submission of a proposed scheduling order and cover letter in each case, until after the motions to dismiss are resolved in the seven other related cases (the “Related Cases”) that have also been referred to Your Honor.²

As Plaintiff has asserted the same patent against all defendants in these and the Related Cases, the parties respectfully submit that coordination of the case schedules for the above-captioned cases with those of the Related Cases would be an efficient use of judicial and party resources. The Related Cases all have motions to dismiss pending, and no orders to initiate scheduling procedures have been issued in those actions.

Defendants have discussed the foregoing proposal with counsel for the defendants in the Related Cases. Defendants in the Related Cases do not object to coordination of the case schedules for these and the Related Cases after the motions to dismiss in the Related Cases have been decided.

¹ D.I. 12 in C.A. No. 19-291; D.I. 20 C.A. No. 19-294.

² *I.e.*, C.A. Nos. 19-292, -293, -295, -296, -297, -534, and -535.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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Should Your Honor have any questions or concerns regarding the foregoing, counsel for Plaintiff and Defendants are available at the Court's convenience.³

Respectfully,

/s/ Samantha G. Wilson

Samantha G. Wilson (No. 5816)

cc: All Counsel of Record (by e-mail)
Counsel of Record for Defendants in the Related Cases (by e-mail)

³ Plaintiff and Defendants will also file a stipulation memorializing the foregoing proposal should the Court request that they do so.